

1 NUTI HART LLP
2 KEVIN W. COLEMAN (CSB 168538)
3 411 30TH Street, Suite 408
4 Oakland, CA 94609-3311
5 Telephone: (510) 506-7152
6 Email: kcoleman@nutihart.com

7
8 Special Counsel for Kavita Gupta, Chapter 7
9 Trustee

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 In re
14 Gabriel Technologies Corporation, a Delaware
15 corporation; and Trace Technologies LLC, a
16 Nevada limited liability company,

17 Administratively
18 Consolidated Debtors,

Case No. 13-30340 (DM) (administratively
consolidated with Case No. 13-30341
(DM))

Chapter 7

**NOTICE OF RESCHEDULED
HEARING ON JOINT MOTION TO
APPROVE SETTLEMENTS AND
GRANT RELATED RELIEF**

Date: July 26, 2019

Time: 10:30 a.m.

Place: United States Bankruptcy Court
450 Golden Gate Ave.,
Courtroom 17

San Francisco, CA 94102

Judge: Hon. Dennis Montali

21 **TO: ALL CREDITORS OF GABRIEL TECHNOLOGY CORP. AND TRACE**
22 **TECHNOLOGY, LLC, INTERESTED PARTIES, THE OFFICE OF THE UNITED**
23 **STATES TRUSTEE, AND**

24 **ALL CREDITORS AND FORMER PARTNERS IN NORTHWATER**
25 **INTELLECTUAL PROPERTY FUND, L.P. 3A**

26 **PLEASE TAKE NOTICE THAT** the hearing originally set for June 28, 2019 at 10:30 a.m.
27 on the Joint Motion to Approve Settlements and Grant Related Relief filed by Qualcomm Incorporated, Kavita Gupta ("Trustee"), Chapter 7 trustee for the estates of Gabriel Technology Corp. and Trace Technologies, L.L.C. ("Debtors Estates"), and GBC HoldCo, LP, IP Successor Fund 21 L.P., and Lake Bridge Capital Inc. ("Motion") has been rescheduled to July 26, 2019 at 10:30 a.m.

1 **PLEASE TAKE FURTHER NOTICE THAT** the rescheduled hearing will take place before
2 the Hon. Dennis Montali in Courtroom 17 at the United States Bankruptcy Court for the Northern
District of California, 450 Golden Gate Avenue, 16th Floor, San Francisco, California 94102.

3 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 90141(c)(1),
4 any objection to the relief requested in the Motion, including the relief seeking a determination that:

- 5 ○ prior to the filing of its Certificate of Cancellation on August 18, 2017, Northwater Intellectual
Property Fund, L.P. 3A (“Northwater”) validly and effectively assigned all of its rights, claims, and
6 interests (including security interests) held against the Debtors under a certain Note Purchase
Agreement (the “NPA”) and a certain Senior Secured Promissory Note dated September 16, 2011
7 (“Secured Note”), as well as all rights it held under Proof of Claim Nos. 137-1 and 159-1 (the
“Northwater Claims”) to GBC Holdco, L.P. (“GBC”);
- 8 ○ notice and a reasonable opportunity to be heard was provided to all persons and entities who are or
were creditors or partners of Northwater on or at any time after August 15, 2016;
- 9 ○ the distribution to be made by the Trustee on account of the Northwater Claims allowed pursuant
to the proposed settlement is payable solely to GBC; and
- 10 ○ all creditors and former partners of Northwater Intellectual Property Fund, L.P. 3A, and any person
11 appointed to act as a receiver, trustee, or manager for Northwater pursuant to 6 Del. C. §17-803(b)
or similar laws, will be permanently barred, enjoined, and restrained from commencing,
12 prosecuting, or asserting any claims against the Trustee or the Debtors’ Estates in any forum that
are predicated upon the Northwater Claims or Northwater’s asserted entitlement to receive a
13 distribution from the assets of the Debtors’ Estates.

14 must be in writing, filed with the Court and served on the undersigned special counsel for the Trustee
by no later than seven (7) days prior to the rescheduled hearing date (i.e., July 19, 2019).

15 Dated: June 25, 2019

NUTI HART LLP

17 By: /s/ Kevin W. Coleman

18 Kevin W. Coleman (CSBN 168538)
19 Special Counsel for
Kavita Gupta, Chapter 7 Trustee